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April 12, 2024

Via Electronic Filing

Hon. Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: *B.Y.C.C., et al. v. United States*, No. 22-cv-06586-MAS
J.A.L.C., et al. v. United States, No. 22-cv-06587-MAS
R.J.P., et al. v. United States, No. 22-cv-06588-MAS
Conditional Settlements and Joint Request for 60-Day
Administrative Termination**

Dear Judge Shipp:

This Office represents Defendant the United States of America in the above-referenced matters. We write with the consent of Plaintiffs' counsel to inform the Court that the parties have reached conditional settlements in all three actions, subject to the finalization of settlement terms, this Court's approval of the settlements of the minor Plaintiffs' claims, and the approval of the Attorney General of the United States or his designee.

As the parties work to finalize these settlements, and to avoid unnecessary litigation expenses or waste of judicial resources, the United States respectfully requests that the Court issue a "60-day order" administratively terminating these cases without prejudice under Local Civil Rule 41.1(b).

If this proposal is acceptable to the Court, we respectfully request that Your Honor "so order" this letter and have the clerk file it on the docket. Thank you very much for your time and consideration of this matter.

Respectfully submitted,

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cc: All counsel of record (via ECF)